



LOWEY DANNENBERG, P.C.

November 23, 2022

MEMO ENDORSED

VIA ECF

The Honorable Sidney H. Stein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007-1312

**Re: *Sonterra Capital Master Fund Ltd., et al. v. Credit Suisse Group AG, et al.,*
No. 15-cv-00871-SHS (S.D.N.Y.)**

Dear Judge Stein,

We write on behalf of the named Plaintiffs in the above-referenced action, Defendant Natwest Markets Plc (f/k/a The Royal Bank of Scotland Plc) ("RBS"), Defendant JPMorgan Chase & Co. ("JPMorgan"), and Defendants Deutsche Bank AG and DB Group Services (UK) Ltd. ("Deutsche Bank") (collectively, the "Settling Defendants"). Pursuant to the Court's November 18, 2022 Order (*see ECF No. 398*), Plaintiffs' deadline to file the Third Amended Class Action Complaint ("TAC") is today.

The TAC contains materials designated as Confidential or Highly Confidential pursuant to the Protective Order governing cooperation materials produced by JPMorgan in connection with JPMorgan's settlement with Plaintiffs (*see ECF No. 147*), as well as materials designated Confidential or Highly Confidential under the Stipulation and [Proposed] Protective Orders applicable to the cooperation materials produced by RBS and Deutsche Bank in connection with their respective settlements with Plaintiffs. *See ECF Nos. 382-387, 399*. The Court previously authorized Plaintiffs to file a redacted copy of the Second Amended Class Action Complaint ("SAC"), which contained materials designated by JPMorgan as Confidential or Highly Confidential under the Court's June 29, 2017 Protective Order governing cooperation materials produced by JPMorgan. *See ECF No. 179*. The Settling Defendants submit that the public filing of the TAC in unredacted form would result in the release of non-public, confidential, proprietary, commercial, and/or customer information. Accordingly, Plaintiffs and the Settling Defendants jointly request that the Court allow Plaintiffs to file an unredacted copy of the TAC under seal and a copy of the TAC bearing limited redactions on the Court's public docket. Plaintiffs will today file a copy of the TAC with proposed redactions highlighted, as well as a

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Nov 29, 2022
Application
granted.
Sp. ordered
Sidney H. Stein
1505



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redacted copy on the Court's public docket, in accordance with Rule 5(B) of the Court's Individual Rules.

We are available to address any questions the Court may have.

Respectfully submitted,

s/Vincent Briganti
Vincent Briganti

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